

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554**

In the Matter of	)	
	)	
Amendment of Part 1 of the Commission's	)	MD Docket No. 10-234
Rules Concerning Practice and Procedure,	)	
Amendment of CORES Registration	)	
System	)	

**COMMENTS OF SPRINT NEXTEL CORPORATION**

Sprint Nextel Corporation ("Sprint Nextel") hereby respectfully submits its comments on the Notices of Proposed Rulemaking in the above captioned proceedings.<sup>1</sup> In the *CORES NPRM*, the Federal Communications Commission ("Commission") seeks comments on proposals to amend the rules governing Practice and Procedure<sup>2</sup> to make customer-related improvements in the CORES Registration System, as well as to make improvements in the process by which entities access and use the information contained in CORES. The Commission notes that the *CORES NPRM* is related to both the Commission's new Core Financial System and the development and design of the new Consolidated Licensing System.

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<sup>1</sup> *Amendment of Part 1 of the Commission's Rules, Concerning Practice and Procedure, Amendment of CORES Registration System*; Notice of Proposed Rulemaking, MD Docket No. 10-234, FCC 10-192, 76 Fed. Reg. 5652 (February 1, 2011) ("*CORES NPRM*").

<sup>2</sup> 47 C.F.R. Part 1.

The proposed modifications *inter alia* include: requiring entities<sup>3</sup> to rely primarily on a single FCC Registration Number (“FRN”) that may be linked to subsidiaries or associated accounts; allowing entities to identify multiple points of contacts; requiring FRN holders to provide email addresses; allowing FRN holders the option to create a custom User ID; modifying the CORES log-in procedure to ease use by multiple individuals; and adding attention flags and notices that would inform FRN holders of their financial standing before the Commission when logging into CORES. These proposed modifications are intended to make CORES more feature-friendly and eliminate some of the system’s current limitations, as well as improve the Commission’s ability to comply with various statutes governing debt collection and the collection of personal information.<sup>4</sup>

Sprint Nextel currently holds over 40,000 Commission geographic area and site-based spectrum licenses in the wireless services and, as a result of acquisitions and mergers, has many license holding entities with multiple assigned FRNs in the CORES System. Therefore, Sprint Nextel particularly appreciates the opportunity to comment on the Commission’s proposals to improve the process and features available in the CORES System. While Sprint Nextel generally supports the Commission’s proposals, the comments herein are limited to the proposed changes to CORES specifically intended to apply to domestic entities that are part of larger corporate structures.

A Single FRN. As the Commission points out, the ability of entities to obtain multiple FRNs since December 2001 not only makes it difficult for the Commission to identify all FRNs

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<sup>3</sup> For the purposes of this proceeding, an entity is defined by the use of a single Tax Identification Number. Affiliated entities that are part of a larger corporate structure would not be limited to use of the same FRN if they have obtained separate TINs from the IRS. *See CORES NPRM* at ¶ 16.

<sup>4</sup> *CORES NPRM* at ¶ 4.

held by an entity but also limits the effectiveness for the Red Light Display System for both the Commission and licensees.<sup>5</sup> For example, Sprint Nextel has multiple FRNs for each of its license holding entities. Generally these multiple FRNs have resulted from the acquisition of entities with legacy FRNs. The ability to create and maintain *ad infinitum* multiple FRNs for each entity have made it cumbersome for large, national companies such as Sprint Nextel, with many licenses and license holding subsidiaries, to efficiently track and manage its CORES information. Additionally, the Red Light Display System's usefulness is marginalized when multiple FRNs can be created for entities without a company's ability to limit and centrally control access to CORES. Therefore, Sprint Nextel strongly supports the Commission's tentative conclusion that it is the best interest of all parties to limit entities to the use of a single FRN linked to subsidiaries or sub-accounts in CORES.

The Commission proposed two options for modifying the structure of the existing FRNs to provide a single FRN in CORES. *Option 1*<sup>6</sup> would permit an entity to use a single ten-digit FRN but also would allow the creation of an unlimited number of sub-accounts distinguished by a unique multi-character suffix that could be assigned to organizational units, such as geographic districts or business groups. The sub-accounts could be created by the entity or, alternatively, automatically generated by the Commission.

Under the Commission's proposed *Option 2*<sup>7</sup> entities that currently hold multiple FRNs would be able to retain them, but they would be electronically linked via an identical prefix that would be automatically assigned whenever one of the entities FRNs was used. Thus, under

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<sup>5</sup> *Id.* at ¶ 13-14.

<sup>6</sup> *Id.* at ¶ 18.

<sup>7</sup> *Id.* at ¶ 19.

*Option 2* entities would be able to keep all their current FRNs and would not be required to re-register in CORES.

Sprint Nextel believes that *Option 2* is the simplest and least burdensome approach for the licensees and the Commission to achieve the goal of linking an entities multiple FRNs under a single FRN designator. The automatic assignment of an identical prefix to entities FRNs by the Commission would avoid issues related to delays or inaction by licensees. Further, as the Commission notes, this method easily accommodates future changes in corporate structures such as those involving acquisitions and mergers. Sprint Nextel suggests that flexibility be provided in CORES to permit entities to easily delete obsolete FRNs and modify FRNs to accommodate changes in an entity's structure. As long as an entity's FRNs are linked together by a prefix, the flexibility to delete FRNs as well as to add new ones, would provide entities with the ability to effectively and efficiently manage their FRNs while providing equivalent capabilities for the Commission to fulfill its debt collection obligations, utilize the Red Light Display System, and improve the usefulness of CORES for the licensing and enforcement bureaus.

The Commission also seeks comment on how entities wish to administer access rights and authority for their single FRN or multiple FRNs that are electronically linked to each other: should CORES allow multiple individuals to be able to register and access a single FRN with their own unique user name and password, or should a "primary registrant" be granted exclusive access and authority for adding subsequent registrants to the FRN and allowing registrant access to the FRN?<sup>8</sup>

Sprint Nextel believes that the suggestion to grant a primary registrant exclusive access with authority to add and delete additional registrants to an FRN or multiple linked FRNs would

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<sup>8</sup> *Id.* at ¶ 21.

improve the process by ensuring centralized control by a designated, responsible individual. This would avoid multiple individuals in various locations having the ability to register an FRN for an entity for a limited purpose without the knowledge or oversight of the organization responsible for licensing functions and maintaining compliance with the Commission's rules and procedures. It would also ensure that the Commission would have a point of contact fully capable of responding or coordinating a response to Commission inquiries. Particularly in regard to entities involved in acquisitions and mergers over the years, Sprint Nextel has experienced difficulty tracking down and responding to Commission correspondence and billing information sent to a contact no longer with the company, listed on an FRN no longer in use. A primary registrant with the ability to update and correct data, as well as add and delete other registrants would be a valuable improvement in CORES to avoid delays due to outdated information, for both the Commission and CORES users.

Multiple Registrants with Multiple Points of Contact. Sprint Nextel supports the Commission's tentative conclusion that FRN holders should have the ability to voluntarily provide additional points of contact for their FRNs.<sup>9</sup> The ability of entities to voluntarily provide points of contact for specific functions such as billing, licensing, legal, etc. would avoid delays and improve efficiency for Commission staff and entity employees. Sprint Nextel suggests that FRN holders be provided the flexibility to create their own categories to reflect their individual organizations. In order to prevent such flexibility becoming unwieldy, the number of points of contact could be limited to three-to-five. In Sprint Nextel's experience managing tens-of-thousands of licenses and numerous FRNs, three-to-five points of contact would be sufficient to provide subject matter experts to readily respond to Commission inquiries.

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<sup>9</sup> *Id.* at ¶ 25.

Registrant E-mail Addresses. Sprint Nextel concurs that today e-mail is an efficient method of communication between the Commission and entities registered in CORES, and supports a requirement to provide e-mail addresses for FRNs, sub-FRNs and points of contact registered in CORES.<sup>10</sup> Such a mandate will help avoid misrouted inquiries and delayed responses between entities and the Commission. However, Sprint Nextel suggests that rather than require e-mail addresses to be confirmed or updated as part of the license renewal process, it would be simpler and more efficient for changes in CORES to update e-mail addresses and other data in the license databases. For example, when Sprint Nextel makes a change to data in CORES a corresponding change may be necessary in over 40,000 licenses.<sup>11</sup> Additionally the individual filing a license renewal may not be authorized to make updates to CORES data.

Log-in Information. While Sprint Nextel supports the Commission's proposal to permit entities to create unique user IDs with unique passwords and personal security questions for each individual authorized to use an FRN or sub-FRN,<sup>12</sup> the entity's primary registrant must have the ability to monitor, modify and delete individual users. As discussed above, Sprint Nextel strongly believes that providing entities the flexibility to designate a primary registrant will provide the oversight of FRN registration necessary to keep CORES information current and avoid outdated data remaining in the system.

Using CORES to Alert FRN Holders About Financial or Other Administrative Issues. Sprint Nextel agrees that it would be beneficial to communicate financial issues and related

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<sup>10</sup> *Id.* at ¶¶40-41.

<sup>11</sup> Recently Sprint Nextel moved offices to another building in close proximity to the previous location. Updates were required for all of Sprint Nextel's more than 40,000 licenses as well as multiple FRNs.

<sup>12</sup> See *CORES NPRM* at ¶¶ 44-45.

administrative information such as status in the Red Light Display System via postings available when logging on to CORES and, in addition, via e-mail alert notifications sent to the e-mail address provided by the primary registrant.<sup>13</sup> This procedure would provide timely notification to those authorized access to the system and capable of taking action on such pending issues. Further, it would reduce instances of information and notifications being misdirected within an organization thus avoiding inadvertent delayed responses or actions.

*Incorporating Data Contained in the Commission's Form 499 Database.* The Commission's initiative to improve the integrity, quality and utility of information filed with the agency should improve the ability of filers and the staff to review data for errors. Sprint Nextel notes, however, that the information submitted on FCC Forms 499-A and 499-Q under one FRN may be a consolidation of data from subsidiary entities, each with its own FRN. Thus certain entities and FRNs may not appear on a Form 499. Rather than incorporating Form 499 data under FRNs in CORES, providing a link in CORES to the data submitted under a holding company's FRN may be a better method of avoiding unnecessary complexity and confusion.

*Conclusion.* For the foregoing reasons, Sprint Nextel supports the Commission's proposal to revise CORES to make process and customer-related improvements. Further, based on its experience as the licensee of more than 40,000 Commission geographic area and site-based spectrum authorizations in a number of wireless services, Sprint Nextel looks forward to participating in the planned public forum at the Commission's headquarters in Washington, DC to discuss these proposed changes and modifications to CORES.

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<sup>13</sup> See Id. at ¶ 46.

Respectfully submitted

SPRINT NEXTEL CORPORATION

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